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|| Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

17 VINCENT HANSEN,
18 Plaintiff,
19 v.
20 SMOKE GUARD CALIFORNIA, INC., a
21 Nevada Corporation,
Defendant.

Case No. 3:23cv2038 RS
ORDER
**STIPULATED REQUEST TO
CONTINUE TRIAL AND TRIAL-
RELATED DEADLINES**

Pretrial Conference Date: January 8, 2025
Trial Date: January 21, 2025

1 IT IS HEREBY STIPULATED, by and between Plaintiff VINCENT HANSEN
2 (“Plaintiff”) and Defendant SMOKE GUARD CALIFORNIA, INC (“Defendant”) (collectively,
3 the “Parties”) as follows:

4 WHEREAS, Plaintiff filed his Complaint on October 23, 2023;

5 WHEREAS, Defendant removed this matter to this Court on April 26, 2023.

6 WHEREAS, on June 28, 2023, the Court denied Plaintiff’s Motion To Remand this case
7 back to the Superior Court

8 WHEREAS, on July 27, 2023, the Parties appeared at the Initial Case Management
9 Conference in this matter.

10 WHEREAS, on July 27, 2023, and after the Initial Case Management Conference in this
11 matter, the Court issued a Case Management Scheduling Order wherein it set the following dates:

12 Jury Trial – January 21, 2025 at 9:00 a.m.

13 Pretrial Conference – January 8, 2025 at 9:00 a.m.

14 WHEREAS, the Parties request additional time to complete certain discovery including,
15 without limitation, the deposition of Defendant’s Person Most Knowledgeable and potentially a
16 further deposition of Plaintiff. The Parties also would like additional time to attempt to resolve this
17 dispute informally, including by way of mediation. Defendant is also considering a dispositive
18 motion.

19 WHEREAS, Defendant’s counsel has trials in other matters scheduled in February, May,
20 June, and late September 2025.

21 WHEREAS, Plaintiff’s counsel has trials in other matters scheduled in June and July 2025
22 and may be out of the office in August 2025.

23 NOW, THEREFORE, based on the foregoing, the Parties, by and through their respective
24 undersigned counsel of record, hereby stipulate to the following:

25 1. For the Court to amend its Case Management Scheduling Order and continue the
26 trial to a date after October 10, 2025. Jury Trial continued to October 20, 2025 and Pretrial
27 Conference continued to October 8, 2025.
28

1
2. For the Court to continue all pre-trial and trial deadlines to coincide with the
3 continued trial date.

4 IT IS SO STIPULATED
5

6 DATED: October 10, 2024

STOEL RIVES LLP

7 */s/Bryan L. Hawkins*
8 BRYAN L. HAWKINS
9 ROBERT SARKISIAN
10 Attorneys for Defendant
11 Smoke Guard California, Inc.
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DATED: October 10, 2024

THE ANORGA LAW FIRM, INC

13 */s/Omar S. Anorga*
14 OMAR S. ANORGA
15 Attorneys for Plaintiff
16 Vincent Hansen
17

I, Bryan Hawkins, attest that each of the
other Signatories to this document have
concurred in the filing of the document,
which shall serve in lieu of their signatures
on the document.

